

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Kevin Pared, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations and have been since March 2023. I am currently assigned to the Seaport-Border Enforcement Security Task Force (BEST) in San Juan, Puerto Rico. Prior to my appointment as a Homeland Security Investigations Special Agent, I was appointed in 2021 as a Border Patrol Agent with the United States Border Patrol. As a Homeland Security Investigations Special Agent, I have received formal and on the job training and I am authorized to investigate violations of laws of the United States and to execute and serve any order, subpoena, summons, warrant, or other process issued under the authority of the United States. I am familiar with the statutes of the United States Code, and as a federal law enforcement officer, I have participated in investigations, surveillance, interviews, interrogations, arrests, searches, seizures, administration of oaths, and in taking and considering evidence concerning the privilege of any person to enter, reenter, pass through, or reside in the United States. Based on my law enforcement experience detailed herein, as well as my training, and experience of other law enforcement officers who are participating in this investigation, serve as the basis for the conclusion set forth herein.

2. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter. I make this affidavit based on my own personal knowledge and on oral and written reports by other federal, state, and/or local law enforcement agents and officers that investigated this matter. This affidavit does not contain all the information derived from this investigation only that which is sufficient to demonstrate probable cause to believe that a crime has been committed.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 8 U.S.C. § 1326 (a) and (b)(1) – *Reentry of removed alien subsequent to a felony conviction* has been committed by John Manuel ABREU (“ABREU”).

PROBABLE CAUSE

4. On February 12, 2025, Homeland Security Investigations (HSI) San Juan Special Agents (SAs) assigned to Operation Alliance conducted surveillance near *Bo. Savarona, 15 Calle Demetrio, Aguayo Apt B, Caguas, PR 00725*, hereinafter “SUBJECT ADDRESS”, in order to locate ABREU who is being investigated for violations of Title 8 of the United States Code.

5. On the same day, HSI SAs observed a gold in color Toyota Corolla bearing Puerto Rico license plate JSM 911, hereinafter “SUBJECT VEHICLE”, parking near SUBJECT ADDRESS. Afterwards, a male, wearing a gray tank top and red shorts, got out of SUBJECT VEHICLE and walked towards SUBJECT VEHICLE’s trunk. HSI SAs recognized the male as ABREU due to similar face and hair style characteristics when compared to ABREU’s Puerto Rico driver’s license picture.

- a. Record checks for Puerto Rico license plate JSM 911 revealed that a gold in color 2005 Toyota Corolla is registered to another person out of “*BO.SAVARONA 15 CALLE DEMETRIO AGUAYO APT B CAGUAS, PR 00725*”. The same address listed for ABREU on his driver’s license.

6. HSI SAs, in an unmarked law enforcement vehicle, moved from a covert location near SUBJECT ADDRESS towards SUBJECT VEHICLE. Subsequently, ABREU started looking and staring at the unmarked law enforcement vehicle, HSI SAs got out of the vehicle and ABREU started running towards a nearby wall. HSI SAs started pursuing ABREU on foot and observed ABREU jumping a wall, one HSI SA continued pursuing ABREU, while yelling

“POLICE!” in Spanish multiple times. ABREU jumped an approximately 6- to 8-foot-high wall, then an approximately 8- to 10-foot-high fence, and continued running eastbound in *Calle Jimenez Cruz*. At the intersection with *Calle Jimenez Cruz* and *Calle Miguel F Chiques*, an HSI SA observed ABREU hiding behind a brush and then attempted to jump another fence of approximately 7 to 10 feet high. While ABREU was trying to jump the fence, an HSI SA arrested ABREU.

7. An HSI SA asked ABREU his name and ABREU identified himself as John ABREU. HSI SAs previously determined, by record checks and surveillance, that ABREU is an alien and not in possession of a valid unexpired immigrant visa, reentry permit, border crossing identification card, or other valid entry document, and was present in the United States without admission or parole. HSI SAs determined that ABREU is inadmissible to the United States and found in the United States after having been previously removed from the United States. HSI SAs transported ABREU to U.S. Immigration and Customs Enforcement – Enforcement and Removal Operations offices for further processing.

8. As to ABREU’s immigration and criminal history, record checks revealed the following:

- a. On or about August 19, 2020, HSI San Juan Document and Benefit Fraud Task Force (DBFTF) SAs arrested ABREU after conducting a controlled delivery of passports and fraudulent U.S. visas.
 - i. On or about August 18, 2020, U.S. Customs and Border Protection (CBP) seized a FedEx package containing two Dominican Republic passports with fraudulent U.S. visa bearing the names of John Manuel ABREU and another individual.

- ii. On or about August 19, 2020, HSI San Juan DBFTF SAs conducted a controlled delivery of the FedEx package and arrested ABREU after determining that ABREU was a citizen and national of the Dominican Republic without the necessary legal documents to be present in the United States.
- iii. On or about August 20, 2020, an U.S. Magistrate Judge issued a federal arrest warrant for violations of Title 18 of the United States Code Section 1546(a) – Fraud and misuse of visas, permits, and other documents in criminal case 20-MJ-829 (BJM).
- iv. On or about September 2, 2020, a federal grand jury charged ABREU on one count of 18 U.S.C. § 1546(a) – Fraudulent Use of Visas, Permits, and Other Documents in criminal case 20-278 (RAM).
- v. On or about December 11, 2020, ABREU pleaded guilty to one count of the Indictment. ABREU was adjudicated guilty of 18 U.S.C. § 1546(a) (a felony offense), imprisoned and sentenced for a term of time served, and three years of supervised release in criminal case 20-278 (RAM).

b. On or about December 16, 2020, ABREU was ordered removed from the United States.

- i. On or about January 5, 2021, was physically removed from the United States to the Dominican Republic.

9. Record checks also revealed that as of February 12, 2025, ABREU had not submitted an application requesting permission to enter the United States (Form I-212) before the U.S. Citizenship and Immigration Services (“USCIS”). Thus, ABREU has not obtained consent

from the Secretary of Homeland Security to enter the United States, nor does he have any immigration documents allowing him to legally enter, pass through or remain in the United States.

10. On February 12, 2025, ABREU, a national and citizen of the Dominican Republic, was found in the United States after having been previously removed from the United States. ABREU subsequent to a felony conviction, and was not admitted, inspected, or paroled into the United States by an immigration officer nor did ABREU present himself at a designed port of entry for inspection.

CONCLUSION

11. Based on the forgoing, and based upon my training, experience and participation in this and other investigations, I believe that sufficient probable cause exists to demonstrate that John Manuel ABREU reentered the United States after being removed subsequent to a felony conviction, in violation of 8 U.S.C. § 1326(a) and (b)(1).

Respectfully submitted,

KEVIN A PARED
CUEVAS

Digitally signed by KEVIN A
PARED CUEVAS
Date: 2025.02.13 08:54:15 -04'00'

Kevin Pared
Special Agent
Homeland Security Investigations

2:21 PM. Sworn to before me ^{by phone} pursuant to FRCP 4.1 on this 13th day of February 2025, at


THE HONORABLE MARCOS E. LOPEZ
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO